

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

INSIGNIA SYSTEMS, INC.,

Plaintiff,

v.

NEWS CORPORATION, NEWS
AMERICA MARKETING FSI L.L.C., AND
NEWS AMERICA MARKETING IN-
STORE SERVICES L.L.C.,

Defendants.

Case No. 19-cv-1820 (MJD/BRT)

**MEET AND CONFER
STATEMENT**

I, Todd Wind, representing the Defendants, hereby certify that:

I met and conferred with the opposing party by:

Multiple email exchanges with Arun Subramanian, Susman Godfrey L.L.P.

On: October 21, 2019

Discussing the following:

Defendants' Motion for Judgment on the Pleadings and, specifically, Defendants' request that Plaintiff voluntarily amend their current complaint to omit any reference to or reliance upon facts pre-dating the Settlement Agreement from Case No. 04-4213. Plaintiff would not agree to voluntarily dismiss and/or amend their complaint as requested.

Also discussed the pending Protective Order, as modified by the Court on October 11, 2019. I advised that Defendants do not have any issues with the changes proposed by the Court. Mr. Subramanian agreed to respond regarding Plaintiff's position shortly.

As a result of the meet-and-confer, the parties:

- ☒ Do not agree on the resolution of any part of the motion.
- ☐ Agree on all or part of the motion and request that the Court incorporate the following agreement in an Order:

Dated: October 21, 2019

s/ Todd Wind

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